

LuNa Smelter Ltd company is dedicated to ensuring that our mineral supply chain remains free from the taint of conflict, human rights abuses, and unethical practices. This Conflict-Affected and High-Risk Area Due Diligence Policy outlines the framework for conducting due diligence in areas marked by conflict and high-risk factors, in compliance with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas

Scope

This policy applies to all mining operations, supply chains, and trading activities conducted within areas classified as conflict-affected and high-risk. It is incumbent upon all employees, suppliers, contractors and stakeholders to adhere to this policy.

Risk Assessment

A comprehensive risk assessment will be conducted, taking into account political, social, environmental, and economic factors. This will guide our due diligence efforts in identifying and mitigating risks within our supply chain.

Supply Chain Management

- a. **Supply Chain Transparency:** We will maintain full transparency in our mineral supply chain, providing accurate and detailed information on the origin and traceability of minerals. This information will be shared with relevant stakeholders.
- b. **Due Diligence Framework:** We will implement and regularly update a robust due diligence framework in accordance with the OECD Guidance. This framework will include risk identification, assessment, and mitigation strategies.

Conflict Minerals Sourcing

- a. **Certified Supply Sources:** We will prioritize sourcing from certified conflict-free supply sources who comply with international standards.
- b. **Supply Chain Audits:** Regular supply chain audits will be conducted to ensure compliance with conflict-free sourcing.

Human Rights and Labor

- a. **Child Labor and Forced Labor:** We will not engage with suppliers who employ child labour or forced labour. All employees will be provided with fair working conditions.
- b. **Human Rights:** We will respect and protect human rights in all aspects of our operations and supply chain.

Environmental Responsibility

Our mining activities will be conducted with a focus on environmental protection and conservation. Compliance with all relevant environmental laws and regulations is imperative.

Reporting and Accountability

- a. **Periodic Reporting:** We will provide regular reports on due diligence measures, supply chain traceability, and risk mitigation efforts.
- b. **Accountability:** Employees and suppliers must be accountable for their actions within the supply chain. Failure to adhere to this policy will result in corrective action, including the termination of business relationships.

Stakeholder Engagement

We will engage with relevant stakeholders, including local communities, governments, and non-governmental organizations, to foster positive relationships and address concerns within conflict-affected and high-risk areas.

Continuous Improvement

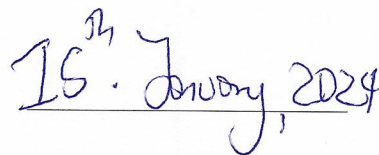
LuNa Smelter is committed to the ongoing enhancement of this policy and our due diligence efforts, aligning them with evolving international standards and best practices.

This Conflict-Affected and High-Risk Area Due Diligence Policy serves as a testament to our unwavering commitment to responsible and ethical business practices, promoting peace and sustainability in areas affected by conflict and high-risk factors.




Joseph BUTERA

MANAGING DIRECTOR



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